

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

KARAMOH TURNER

Defendant.

Case:2:22-cr-20596  
Judge: Lawson, David M.  
MJ: Altman, Kimberly G.  
Filed: 11-10-2022 At 03:22 PM  
INDI USA V. TURNER (NA)

Violations:  
18 U.S.C. § 1343  
18 U.S.C. § 1028A

**INDICTMENT**

THE GRAND JURY CHARGES:

**COUNT ONE**

*(18 U.S.C. § 1343 – Wire Fraud)*

Beginning in or around April 2020 and continuing through in or around July 2021, in the Eastern District of Michigan and elsewhere, the defendant, KARAMOH TURNER, with the intent to defraud, knowingly devised and executed a scheme to defraud in order to deprive another of money and property by means of materially false and fraudulent representations.

The purpose of the scheme to defraud was for KARAMOH TURNER to unlawfully obtain state and federal unemployment insurance (UI) benefit money.

It was part of the scheme that KARAMOH TURNER submitted false and fraudulent UI benefit claim applications to multiple states—including California, Nevada, Arizona, Maryland, Michigan—in the names of various individuals, without their consent, knowledge, or permission.

It was part of the scheme that KARAMOH TURNER used these other individuals' names, social security numbers, and other personal identifiable information (PII), without their consent, knowledge, or permission, in the course of the UI benefit claim submission process.

It was further part of the scheme and artifice that, for the UI benefit claim submitted to California and Maryland, KARAMOH TURNER would cause a bank to mail, via U.S. Postal Service, a debit card to an address within his control. These debit cards ("UI debit cards") were then loaded, electronically, with state and federal UI benefits by the various state treasury departments.

It was further a part of the scheme and artifice that once KARAMOH TURNER obtained these UI debit cards, he would use the funds contained thereon in the Eastern District of Michigan and elsewhere.

During the time period set forth above, in the Eastern District of Michigan, for the purpose of executing the above-described scheme to defraud, KARAMOH TURNER knowingly transmitted and caused the transmission by means of wire, radio, or television communication, writings, signals, pictures, and sounds in

interstate commerce, in the form of: on June 24, 2020, an interstate electronic submission of a fraudulent UI claim was filed from within the Eastern District of Michigan to the Maryland Department of Unemployment Insurance (“DUI”), in violation of Title 18, United States Code, Section 1343.

**COUNT TWO**

*(18 U.S.C. § 1028A(a)(1) – Aggravated Identity Theft)*

The allegations contained in Count One are hereby repeated, realleged, and incorporated by reference as if fully set forth herein.

On or about June 24, 2020, in the Eastern District of Michigan and elsewhere, the defendant KARAMOH TURNER, knowingly possessed and used, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028(A)(c)—that is, Wire Fraud, in violation of 18 U.S.C. § 1343, as alleged in Count One—knowing that the means of identification belonged to another actual person, in violation of Title 18, United States Code, Section 1028A(a)(1).

THIS IS A TRUE BILL

s/Grand Jury Foreperson  
GRAND JURY FOREPERSON

DAWN N. ISON  
United States Attorney

s/Craig Wininger  
CRAIG WININGER  
Chief, Violent and Organized Crime Unit

s/David Cowen  
DAVID COWEN  
Assistant U.S. Attorney

s/Jeanine Brunson  
JEANINE BRUNSON  
Assistant U.S. Attorney

Dated: November 10, 2022

United States District Court  
Eastern District of Michigan

**Criminal Case Cover Sheet**

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete the case in all respects.

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	<b>Judge Assigned:</b>
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>AUSA's Initials:</b> <i>DPC</i>

**Case Title:** USA v. Karamoh Turner

**County where offense occurred :** Wayne

**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☐ Information --- no prior complaint.  
☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 22-MJ-30474 ]  
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

November 10, 2022  
Date

*(Signature)*  
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 Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.